

2019 SEP -4 P 1:23

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DISTRICT OF UTAH

DEPUTY CLERK

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH  
 \_\_\_\_\_ DIVISION

VILCE JOSE RAUDEZ  
 (Full Name)

PLAINTIFF

vs.

ROY D. REISER JR.  
ELSHA REISER  
SUBWAY CORPORATION

DEFENDANTS

**CIVIL RIGHTS COMPLAINT**  
 (42 U.S.C §1983, §1985)

Case: 2:19-cv-00621  
 Assigned To : Waddoups, Clark  
 Assign. Date : 9/4/2019  
 Description: Raudez v. Reiser et al

A. JURISDICTION

1. Jurisdiction is proper in this court according to:

- a. 42 U.S.C. §1983  
 b. 42 U.S.C. §1985  
 c. Other (Please Specify) \_\_\_\_\_

2. NAME OF PLAINTIFF VILCE JOSE RAUDEZ  
 IS A CITIZEN OF THE STATE OF UTAH

PRESENT MAILING ADDRESS: 177-WEST 300-NORTH APT. #9  
SALT LAKE CITY, UTAH 84103

3. NAME OF FIRST DEFENDANT ROY D. REISER JR.  
IS A CITIZEN OF UTAH  
(City and State)

IS EMPLOYED AS \_\_\_\_\_ at \_\_\_\_\_.  
(Position and Title if Any) (Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred?

YES \_\_\_ NO \_\_\_. If your answer is "YES" briefly explain.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

4. NAME OF SECOND DEFENDANT ELSHA REISER  
(If applicable)

IS A CITIZEN OF UTAH  
(City and State)

IS EMPLOYED AS \_\_\_\_\_ at \_\_\_\_\_.  
(Position and Title if Any) (Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred?

YES \_\_\_ NO \_\_\_. If your answer is "YES" briefly explain.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

5. NAME OF THIRD DEFENDANT SUBWAY CORPORATION  
(If applicable)

IS A CITIZEN OF UTAH  
(City and State)

IS EMPLOYED AS \_\_\_\_\_ at \_\_\_\_\_.  
(Position and Title if Any) (Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred?

YES \_\_\_ NO \_\_\_. If your answer is "YES" briefly explain.

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6. NAME OF FOURTH DEFENDANT \_\_\_\_\_  
(If applicable)

IS A CITIZEN OF \_\_\_\_\_  
(city and State)

IS EMPLOYED AS \_\_\_\_\_ at \_\_\_\_\_.  
(Position and Title if Any) (Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred?

YES \_\_\_ NO \_\_\_. If your answer is "YES" briefly explain.

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(Use additional sheets of paper if necessary.)

**B. NATURE OF CASE**

1. Why are you bringing this case to court? Please explain the circumstances that led to the problem.

FOR REASON OF HARRASSMENT AND RACE  
DESCRIMINATION ON THE JOB. THE DEFENDANTS  
ROY DREISER AND ELSHA REISER CONSTANTLY  
USED RACIST PROCEDURES AND HARRASSMENT AGAINST  
MY PERSON WHILE AT WORK.

C. CAUSE OF ACTION

1. I allege that my constitutional rights, privileges or immunities have been violated and that the following facts form the basis for my allegations: (If necessary you may attach additional pages)

a. (1) Count I: RACE DISCRIMINATION

- (2) Supporting Facts: (Describe exactly what each defendant did or did not do. State the facts clearly in your own words without citing legal authority or arguments.)

THE DEFENDANT ROY D. REISER JR.  
ALWAYS FORCED ME TO WORK OVER  
TIME HOURS WITHOUT PAY FOR 13 YRS.  
ALSO FORCED ME TO WORK HOLIDAYS  
AND PAY ME THOSE AS REGULAR DAYS.

b. (1) Count II: HARRASSMENT AT WORK

- (2) Supporting Facts: THE DEFENDANTS ROY D.  
REISER JR. AND ELSHA REISER  
CONSTANLY WERE FOLLOWING ME WHILE  
WORKING TO WATCH HOW I WAS PERFORMING  
MY JOB. THEY WERE CONSTANLY TRYING  
TO FIND IF I MAKE MISTAKES DOING MY  
JOB

c. (1) Count III: \_\_\_\_\_

(2) Supporting Facts: \_\_\_\_\_

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**D. INJURY**

1. How have you been injured by the actions of the defendant(s)?

NONE APPLICABLE

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**E. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF**

1. Have you filed other lawsuits in state or federal court that deal with the same facts that are involved in this action or otherwise relate to the conditions of your imprisonment?  
YES \_\_\_\_\_ / NO \_\_\_\_\_. If your answer is "YES," describe each lawsuit. (If there is more than one lawsuit, describe additional lawsuits on additional separate pages, using the same outline.)

- a. Parties to previous lawsuit:

Plaintiff(s): \_\_\_\_\_

Defendant(s): \_\_\_\_\_

- b. Name of court and case or docket number: \_\_\_\_\_

- c. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_
- d. Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- e. When did you file the lawsuit? \_\_\_\_\_  
Date Month Year
- f. When was it (will it be) decided? \_\_\_\_\_
2. Have you previously sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in Part C? YES\_\_\_\_ / NO \_\_\_\_\_. If your answer is "YES" briefly describe how relief was sought and the results. If your answer is "NO" explain why administrative relief was not sought.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**F. REQUEST FOR RELIEF**

1. I believe that I am entitled to the following relief:

THE ONLY TWO THINGS I'M ASKING FOR  
RELIEF, IN THIS CASE ARE: 1) APOLOGIES FROM  
THE DEFENDANTS FOR WHAT THEY DID TO ME  
AND 2) MONEY COMPENSATION FOR ALL MY SUFFERINGS  
(MENTAL)

**DECLARATION UNDER PENALTY OF PERJURY**

The undersigned declares under penalty of perjury that he/she is the plaintiff in the above action, that he/she has read the above complaint, and that the information contained therein is true and correct. 28 U.S.C. §1746; 18 U.S.C §1621.

Executed at UTAH STATE on 03/09 20 19.  
(Location) (Date)

  
\_\_\_\_\_  
Signature